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SENSITIVE SIPDIS

PM/DTCC

E.O. 12958: N/A

TAGS: ETRD ETTC EIND EINT KU

SUBJECT: RESPONSE, BLUE LANTERN BONA FIDES CASE NO. K-0721

REF: STATE 9556

- 11. (SBU) Per reftel request, Econoff visited the Fouad M.T. Al-Ghanim Establishment on December 10 and met with its operations manager, Steven Mathews, to substantiate the company's bona fides as a broker of USML items. Mathews is doing business out of Continental Hotel, one of Fouad Al-Ghanim's buildings. Mathews stated that Al-Ghanim Establishment serves as an agent/broker for American companies supporting U.S. efforts in Iraq and Afghanistan. Al-Ghanim Establishment was set up in the 1970s by its owner, Fouad Al-Ghanim. Al-Ghanim Establishment employs up to 23 people and works primarily with Sikorsky Aircraft Corporation as an agent for Black Hawk helicopter purchases. Mathews estimates Al-Ghanim Establishment's annual revenue is USD 75 million.
- 12. (U) Al-Ghanim Establishment counts the MoD, MoI and the Amiri Guard as its government clients. Econoff later confirmed Al-Ghanim Establishment's registration with the Kuwait Chamber of Commerce and Industry.
- 13. (U) Mathews said that his company does not market U.S.-origin equipment outside of Kuwait, although he does have clients in Saudi Arabia. Mathews indicated that he is aware of U.S. Munitions List restrictions, including the prohibition against unauthorized re-transfers and re-exports. He also noted that Sikorsky requires all staff conduct annual training transfer restrictions and the Foreign Corrupt Practices Act. Mathews stated that his company occasionally stores demonstration helicopters in a secure Shuweikh warehouse under the supervision of the physical guards, electronics and the Ministry of Interior.
- $\P4$. (SBU) Post believes that Al-Ghanim Establishment is a reputable broker for U.S. products.